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*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the
Liquidation of Bernard L. Madoff Investment
Securities LLC,

Plaintiff,

v.

ABN AMRO BANK (IRELAND) LTD.
(f/k/a FORTIS PRIME FUND SOLUTIONS
BANK (IRELAND) LIMITED) and

ABN AMRO CUSTODIAL SERVICES
(IRELAND) LTD. (f/k/a FORTIS PRIME
FUND SOLUTIONS CUSTODIAL
SERVICES (IRELAND) LTD.),

Defendants.

Adv. Pro. No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-05355 (SMB)

**DECLARATION OF REGINA GRIFFIN IN SUPPORT OF THE TRUSTEE'S
MOTION FOR LEAVE TO FILE SECOND AMENDED COMPLAINT**

I, Regina Griffin, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a member of the New York Bar and a partner at Baker & Hostetler LLP, counsel for plaintiff Irving H. Picard, as trustee (the “Trustee”) for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.*, and the chapter 7 estate of Bernard L. Madoff.

2. As an attorney of record in these proceedings, I am fully familiar with the facts set forth herein based either upon my own personal knowledge or upon information conveyed to me.

3. I make this declaration to provide relevant information in connection with the Trustee’s Motion for Leave to File A Second Amended Complaint (the “Motion”).

4. On January 11, 2019, the parties stipulated and agreed to a briefing schedule for the filing of the Trustee’s Motion. The parties stipulated and agreed that the Trustee would file his Motion on or before February 22, 2019 and that defendants ABN AMRO (Ireland) Ltd. And ABN AMRO Custodial Services (Ireland) Ltd. would file their opposition on or before April 23, 2019. The parties further agreed that the Trustee would file a reply on or before May 23, 2019.

5. Attached hereto as **Exhibit A** is the Trustee’s proposed Second Amended Complaint (“PSAC”) for review by the Court. The PSAC alleges additional facts regarding the subsequent transfers sought to be recovered, as further discussed in the accompanying Memorandum of Law in Support of the Trustee’s Motion for Leave to File an Amended Complaint.

6. Attached hereto as **Exhibit B** is the Trustee’s amended complaint in the adversary proceeding *Picard v. Tremont Group Holdings, Inc. (In re BLMIS)*, Adv. Pro. No. 10-05310,

ECF No. 1 (Bankr. S.D.N.Y. Dec. 7, 2010), which is incorporated by reference in the Trustee's Motion and PSAC.

7. Attached hereto as **Exhibit C** is the Trustee's Proposed Order in connection with the Motion.

8. No prior application or motion for similar relief has been made to this or any other court.

I hereby declare under penalty of perjury that the foregoing statements made by me are true and correct.

Executed on the 22nd day of February, 2019, at New York, New York.

/s/ Regina Griffin

Regina Griffin